

Hearing Date: July 30, 2015
Reply Deadline: July 20, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 11
RESIDENTIAL CAPITAL, LLC, <i>et al.</i> , Debtors.	Case No. 12-12020 (MG) (Jointly Administered) Re: Docket No. 5679
In re: RESCAP LIQUIDATING TRUST MORTGAGE PURCHASE LITIGATION	Adv. Pro. No. 14-07900 (MG)
<i>This document relates to:</i>	
Residential Funding Co. v. HSBC Mortg. Corp. (USA), Adv. Pro. No. 14-01915 (MG)	
Residential Funding Co. v. UBS Real Estate Secs., Inc., Adv. Pro. No. 14-01926 (MG)	
ResCap Liquidating Trust v. Summit Fin. Mortg. LLC, Adv. Pro. No. 14-01996 (MG)	
ResCap Liquidating Trust v. Mortg. Investors Grp., Inc., Adv. Pro. No. 14-02004 (MG)	
Residential Funding Co. v. SunTrust Mortg. Inc., Adv. Pro. No. 13-1820 (MG)	

**JOINDER OF (A) LEAD PLAINTIFF NEW JERSEY CARPENTERS HEALTH FUND
ON BEHALF OF ITSELF AND THE CERTIFIED CLASS IT REPRESENTS, (B)
CAMBRIDGE PLACE INVESTMENT MANAGEMENT INC., AND (C) UNION
CENTRAL LIFE INSURANCE COMPANY, AMERITAS LIFE INSURANCE CORP.,
AND ACACIA LIFE INSURANCE COMPANY TO RESPONSE OF THE RESCAP
LIQUIDATING TRUST AND RESIDENTIAL FUNDING CO. TO DEFENDANTS'
MOTION TO MODIFY ORDER APPOINTING MEDIATOR**

1. On June 3, 2015, the defendants in the above-referenced adversary proceeding filed the *Notice of Defendants' Motion to Modify Order Appointing Mediator* and a memorandum of law in support thereof [D.I. 85, 86].

2. On June 30, 2015, the ResCap Liquidating Trust and Residential Funding Co. filed the *Response of the ResCap Liquidating Trust and Residential Funding Co. to Defendants' Motion to Modify Order Appointing Mediator* [Case No. 12-12020, D.I. 8834; Adv. Pro. No. 14-7900, D.I. 91] (the "Opposition").

3. The following parties (the "Joining Parties") hereby join in the Opposition:

(a) New Jersey Carpenters Health Fund, the court-appointed lead plaintiff (the "Lead Plaintiff") in the consolidated securities class action styled as *New Jersey Carpenters Health Fund, et als., on Behalf of Themselves and All Others Similarly Situated v. Residential Capital, LLC, et als.*, filed in the United States District Court for the Southern District of New York (the "District Court"), Case No. 08-CV-8781 (HB) (the "MBS Litigation"), for itself and on behalf of the class of purchasers defined and certified in the MBS Litigation (the "Certified Class");

(b) Cambridge Place Investment Management Inc. ("Cambridge Place"), plaintiff in the civil actions styled as *Cambridge Place Investment Management Inc. v. Morgan Stanley & Co., Inc., et al.*, filed in the Superior Court of Massachusetts, Case Nos. 10-2741-BLS1 and 11-0555-BLS1 (the "CPIM Actions"); and

(c) Union Central Life Insurance Company, Ameritas Life Insurance Corp., and Acacia Life Insurance Company (the "Union Central Parties"), plaintiffs in the civil action styled as *Union Cent. Life Ins. Co. et al. v. Credit Suisse First Boston Mortg. Sec.*

Corp. et al., filed in the District Court, Case No. 11-CV-2890 (GBD) (the “Union Central Action”).

4. The Joining Parties reserve all rights with respect to the MBS Litigation, the CPIM Actions, and the Union Central Action.

Dated: July 2, 2015
New York, New York

Respectfully submitted,

/s/ Michael S. Etkin
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Bankruptcy Counsel for Lead Plaintiff, the Certified Class, Cambridge Place, and the Union Central Parties